

Gene J. Stonebarger, State Bar No. 209461
gstonebarger@stonebargerlaw.com
Richard D. Lambert, State Bar No. 251148
rlambert@stonebargerlaw.com
Elaine W. Yan, State Bar No. 277961
eyan@stonebargerlaw.com
STONEBARGER LAW
A Professional Corporation
75 Iron Point Circle, Suite 145
Folsom, CA 95630
Telephone: (916) 235-7140
Facsimile: (916) 235-7141

James R. Patterson, State Bar No. 211102
jim@pattersonlawgroup.com
Allison H. Goddard, State Bar No. 211098
ali@pattersonlawgroup.com
PATTERSON LAW GROUP
A Professional Corporation
402 W. Broadway, 29th Floor
San Diego, CA 92101
Telephone (619) 398-4760
Facsimile (619) 756-6991

Attorneys for Plaintiff Deanna Morey and the Class

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

DEANNA MOREY, an individual, on
behalf of herself and all others similarly
situated,

Plaintiff,

vs.

LOUIS VUITTON NORTH AMERICA,
INC., and DOES 1 through 50,

Defendants.

Case No. 3:11-cv-01517-WQH-BLM

**NOTICE OF MOTION AND
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL
OF CLASS ACTION
SETTLEMENT**

[Filed concurrently with Class Action
Settlement Agreement; Declaration of
Gene J. Stonebarger; and Proposed
Order]

Date: April 5, 2013
Time: 9:30 a.m.
Courtroom: 14B
Judge: Hon. William Q. Hayes

TO THE COURT AND TO ALL PARTIES AND THEIR ATTORNEYS:

PLEASE TAKE NOTICE that on April 5, 2013, at 9:30 a.m., or as soon thereafter as counsel can be heard in Department 14B of the above-entitled Court located at 333 West Broadway, San Diego, CA 92101, Plaintiff Deanna Morey will and hereby does move for an Order Preliminarily Approving the Class Action Settlement in this matter pursuant to Federal Rule of Civil Procedure 23, including each of the following:

(1) preliminarily approving the Settlement Agreement as being fair, reasonable, and adequate;

(2) provisionally certifying the Class under Fed. R. Civ. P. 23 for settlement purposes only;

(3) preliminarily approving the form, manner, and content of the Class Notices and Claim Form;

(4) appointing Plaintiff Deanna Morey as the Class representative;

(5) appointing the law firms of Stonebarger Law, APC and Patterson Law Group, APC as counsel for the Class; and

(6) setting the date and time of the Fairness Hearing.

This motion for preliminary approval of a class action settlement is based upon this notice of motion and motion, the accompanying memorandum of points and authorities, the supporting Declaration of Gene J. Stonebarger, the records and files in this action, and upon such further and additional papers and argument as may be presented herein.

DATED: March 28, 2013

STONEBARGER LAW, APC

PATTERSON LAW GROUP, APC

By: /s/ Gene J. Stonebarger
Gene J. Stonebarger
gstonebarger@stonebargerlaw.com
Attorneys for Plaintiff Deanna Morey
and the Class